UNITED STATES DISTRICT COURT for the Southern District of New

Case No.: 1:23-cv-07356

DR. LOUIS EMOVBIRA WILLIAMS

Plaintiff

 $\mathbf{v}\mathbf{s}$

FEDERAL GOVERNMENT OF NIGERIA; ATTORNEY GENERAL OF THE FEDERAL GOVERNMENT OF NIGERIA; CENTRAL BANK OF NIGERIA; JPMORGAN CHASE & CO.; and JOHN DOES 1 - 10,

Defendants

DEFENDANTS FEDERAL GOVERNMENT OF NIGERIA AND ATTORNEY GENERAL OF THE FEDERAL GOVERNMENT OF NIGERIA'S JOINDER IN DEFNEDNT CENTRAL BANK OF NIGERIA'S AMENDED REMOVAL

TO: The Honorable Judges Of The United States District Court For The Southern District Of New York And To All Parties And Their Attorneys Of Record:

PLEASE TAKE NOTICE that the Defendants Federal Government Of Nigeria and Attorney General of The Federal Government of Nigeria, whom have not been properly served in the proceeding, and herein reserving the right to challenge the

defective service in this proceeding, hereby join in the Defendant Central Bank Of

Nigeria's Amended Notice of Removal of the State court action described in said Notice of

Amended Removal, to this Court.

1. Defendants Federal Government of Nigeria (FGN) and Attorney General of The Federal

Government of Nigeria, (AG FGN) asserts that they have not been properly served with

process pursuant to 28 U.S.C. §§ 1608 (a)– (b), and in joining this removal continues to

reserve their right to contest the service in this proceeding. The Defendant AG FGN,

first received notice of this action, at the earliest on July 20, 2023. Pursuant to 28 U.S.C.

§§ 1608 (d), upon a service of process that complies with 28 U.S.C. §§ 1608, the

Defendants are to file a responsive pleading sixty days after service has been made.

2. The Defendants (FGN and AG FGN) does not admit or submit to any personal or

subject matter jurisdiction, or to venue or the propriety or convenience of this forum and

expressly reserves these issues for future challenge. The Defendants further expressly

reserves all service and foreign sovereign immunity issues and defenses for future

challenge, pursuant to FSIA, 28 U.S.C. §§ 1604-05 and 1608.

Dated: August 21, 2023

Respectfully submitted,

/s/ Gerald O. Egbase

Gerald O. Egbase

(Pro Hac Vice Admission Pending)

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Attorneys for the Defendants

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Certificate of Service

I hereby certify that on August 21, 2023, **DEFENDANTS FEDERAL GOVERNMENT OF NIGERIA AND ATTORNEY GENERAL OF THE FEDERAL GOVERNMENT OF NIGERIA JOINDER IN DEFNEDNT CENTRAL BANK OF NIGERIA'S AMENDED REMOVAL**, was electronically filed served with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record, I further emailed copies of the same pleadings to counsels:

Baruch S. Gottesman, Esq.; e-mail: <u>bg@gottesmanlegal.com</u>

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Attorneys for Defendants, Central Bank of Nigeria

/s/Gerald O. Egbase Gerald O. Egbase